

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

ROBERT SHEREZ,

Plaintiff,

vs.

STATE OF HAWAII DEPARTMENT
OF EDUCATION; PATRICIA
HAMAMOTO, Superintendent of
Hawaii Schools, MEREDETH
MAEDA, Principal, Castle High
School; SARA GRONNER OR
GRONNA, Vice Principal of Castle
High School,

Defendants.

CIVIL NO. 04-00390 JMS-KSC

DECLARATION OF SARAH
GRONNA

DECLARATION OF SARAH GRONNA

I, SARAH GRONNA, declare as follows:

1. I am employed by the Department of Education as a Test Development Specialist II in the Student Assessment Section. I have served in this position since July 1, 2003. My present duties include developing assessments for the state of Hawaii, conducting studies and writing reports to comply with the requirements of the No Child Left Behind Act of 2001, analysis of student performance in Hawaii, and conducting alignment and validity studies of the assessments developed for Hawaii.

2. During the school years of 2001-2002 and 2002-2003, I served as one of three vice principals for Castle High School. My duties as a vice principal included oversight of school's individual education plans for special education students and modification plans for physically disabled students. I was also responsible for monitoring geographic exemptions, maintaining school safety plans, the evaluation and assessment of data, and truancy petitions for the students assigned to me. I also served as a grade level advisor.

3. As a vice principal of Castle High School, I was familiar with programs that provided off campus instruction for students who were not able to attend school. One of these programs is known as the Home-Hospital Instructional Services program. This program offers tutoring services to students not able to attend school for medical reasons. As far as I know, this program did not have a policy that prohibited the assignment of a male teacher as a tutor for a female student. Moreover, during the school years of 2001-2002 and 2002-2003, I was not assigned to supervise the implementation of this program for Castle High School nor was I authorized to establish policy for this program. Therefore, I never established such a policy.

4. In July 2002, the Home-Hospital Instructional Services program had begun to institute new procedures for services, including the assignment of tutors. Part of the new procedures included new forms to be completed and authorizing

the schools to select the qualified tutor to instruct the student. However, since the new procedures were being first implemented, during the 2002-2003 school year, the Windward District Office, that administered the program, advised Castle High School that the Home-Hospital Instructional Services program would retain the sole authority to select and assign the tutors.

5. Early in the 2002-2003 school year, when the vice principal assigned to oversee this program on behalf of students of Castle High School had been on leave and I was assigned to facilitate the implementation of this program for 2002-2003 at Castle High School, a counselor approached me with an outdated application form for a home tutor in the Home-Hospital Instructional Services program on behalf of a pregnant female student. This form had several incorrect entries and the counselor had written in the "Name of Tutor" section "Robert Sherez".

6. In accordance with the instructions from the Windward District Office, I forwarded a completed, correct application form to the program in order for the program to select the tutor. At no time, did I select any particular individual to serve as the tutor for this female student.

7. In accordance to the instruction of the Windward District Office, I did not make any selection of tutors for the home instruction of students during the 2002-2003 school year, under the Home-Hospital Instructional Services program.

At the close of the 2002-2003 school year, I left the position of vice principal of Castle High School and transferred to the position of Test Development Specialist located at Kokohead Elementary School, Room J 103.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawai'i, December 15, 2006.


SARAH GRONNA